

# BMW Group

Via Electronic Filing

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: WT Docket No. 10-4  
Comments in Support of Kathrein Waiver Request

Dear Ms. Dortch:

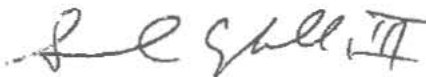
BMW of North America, LLC ("BMW") hereby comments in support of the Kathrein Petition for Waiver of Section 20.21 of the Commission's Rules to permit the equipment certification and sale of Kathrein's mobile phone signal booster.<sup>1</sup>

Grant of the Kathrein waiver would benefit the automobile industry by making available for cars sold to the U.S. market a signal booster that consumers would be able to use upon delivery of the car, without need for installation. A signal booster installed in the vehicle allows the mobile phone to operate at a lower power state which can reduce the amount of transmissions within the vehicle cabin, and allow more energy to be conserved in the battery. For example, BMW designs automobiles with window tinting that shields the car interior from UV and IR light, but which also may interfere with the receipt and transmission of wireless signals. The Kathrein device, installed in such an automobile, would improve mobile phone reception, which would benefit consumers and advanced the Federal Communications Commission's ("Commission") policy of enhancing wireless coverage.

In BMW's view, the design of the Kathrein device and installation by automobile manufacturers will ensure that consumers will not be able to defeat the anti-oscillation safeguards.

For these reasons, the Commission should grant Kathrein's request.

Respectfully Submitted,



Sam Campbell  
Department Head  
Safety Engineering and Intelligent Transportation Systems

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<sup>1</sup> Public Notice, Wireless Telecommunications Bureau Seeks Comment on Kathrein Request for Waiver to Permit Equipment Certification for Sale of Mobile Phone Signal Booster, DA 15-834 (rel. July 21, 2015).

